

Exhibit K

From: [Nicole Wing](#)
To: [Vander Stoep, Kari L.](#)
Cc: [Wahi, Pallavi Mehta](#); [Gammell, Ashley E.M.](#); [James Griffith](#); [Julianne DArdares](#); [Smith, Brian J.](#); [Wahi, Pallavi Mehta](#); [Gammell, Ashley E.M.](#); [Smith, Brian J.](#)
Subject: Re: Espro sales data [KLG-USW_ACTIVE01.FID1515658]
Date: Friday, December 20, 2024 10:01:34 AM

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Hi Kari,

We have not received any response to our request to meet and confer. To be specific, we intend to ask the Court to extend the expert discovery deadline and either (1) order the records to be produced in response to our prior requests, or (2) allow a limited re-opening of fact discovery so that we may serve requests that are unambiguous without question.

At a minimum, can you please let us know if the extension request is opposed? We have extended you every courtesy in agreeing to each extension you have requested.

Kind regards,
Nicole

On Dec 19, 2024, at 9:24 AM, Nicole Wing <nicole.wing@bodum.com> wrote:

Hi Kari,

We disagree that these are not encompassed by Request No. 8. But considering the disagreement, we need to meet and confer prior to us approaching the court to address the matter. Are you available today or tomorrow morning to discuss?

Kind regards,
Nicole Wing

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Sent: Wednesday, December 18, 2024 11:23 AM
To: Nicole Wing <nicole.wing@bodum.com>
Cc: Wahi, Pallavi Mehta <pallavi.wahi@klgates.com>; Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; James Griffith <jgriffith@ziliak.com>; Julianne DArdares <jdardanes@ziliak.com>; Smith, Brian J. <Brian.J.Smith@klgates.com>; Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Subject: re: Espro sales data [KLG-USW_ACTIVE01.FID1515658]

Hi Nicole –

These documents were not requested in discovery. Please see the attached discovery requests and responses.

Kari

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[<~WRD0005.jpg>](#)

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From: Nicole Wing <nicole.wing@bodum.com>
Sent: Tuesday, December 17, 2024 2:09 PM
To: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Cc: Wahi, Pallavi Mehta <pallavi.wahi@klgates.com>; Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; James Griffith <jgriffith@ziliak.com>; Julianne DArdares <jdarndares@ziliak.com>
Subject: Espro sales data

Hi Kari,

We have poured over the data provided in Starbucks' productions and do not see that the purchase orders or other sales records for the Espro product at issue in the 2023 case were ever produced. If we are missing something, can you please direct me to these documents? Otherwise, can you please arrange for a supplemental production? As you can imagine, this is handicapping the progress of our damages experts' work.

Kind regards,
Nicole

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